

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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|-------------------------|---|------------------------|
| IN RE: | : | Chapter 11 |
| | : | |
| MAJOR EVENTS GROUP, LLC | : | BANKR. NO. 18-10112ELF |
| | : | |
| | : | |
| Debtor. | : | |

ANSWER TO ACTING UNITED STATES TRUSTEE'S MOTION FOR SANCTIONS AGAINST MICHAEL P. KUTZER, ESQUIRE FOR VIOLATION OF FED.R.BANK.P. 9011

Michael P. Kutzer, Esq. answers the motion of the U.S. Trustee as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part, denied in part. Counsel inadvertently used the wrong form; the Voluntary Petition for Individual was used as opposed to the correct form for non-individuals. The Petition was signed by Antoine Gardiner, President of Major Events Group, LLC. However, as stated previously the wrong form was used. The Interview took place over several hours and Mr. Gardiner was leaving town immediately after the interview. In haste, the form was printed and Counsel neglected to check the non-individual filing box and the wrong petition was generated.
5. Counsel was preparing those documents when he realized the wrong petition was filed and was attempting to contact Mr. Gardiner who was out of town so that he could file the correct form. Another petition has been filed, 18-11123, and the Corporate ownership, Authorization to sign and file and the 2106(b) have been filed. I originally received \$6,000.00 including the filing fee. I refilled the petition and paid the filing fees out of my funds; I did not charge the client for the mistake in filing.

6. As stated above I was about to and wanted to wait until my client returned from his trip to correct the petition and then file the 2106(b).

7. Admitted.

8. Counsel did not see the Notice of hearing and did not attend.

9. Denied. Counsel spoke with the attorney for one of the creditors who had scheduled a sheriff's sale. The filing is an attempt to work out repayment of a real estate loan. The subsequent filing will accomplish this. Counsel for the same creditor has again been contacted about filing case 18-11123.

10. Admitted.

11. This is a legal summation of the law and no response is required.

12. Admitted. The Petition was filed to begin the reorganization of the Major Events Group, LLC debts, the secured debts being the debts which brought about this Chapter 11 filing.

13. Admitted in part, denied in part. the documents were signed but not filed with the Court.

14. Denied. the Creditor understood the reason for the filing and stated a willingness to work for a solution.

15. Denied. Counsel did not violate Rule 9011(b).

Wherefore, Counsel respectfully requests the Motion of the U.S. Trustee be denied.

February 20, 2018

Respectfully Submitted

/s/Michael P. Kutzer
Michael P. Kutzer, Esquire
1420 Walnut Street, suite 1188
Philadelphia, PA 19102
215-687-6370
215-689-1949 Fax